

CHRIS D. KUHNER, ESQ. (Bar No. 173291)  
**KORNFIELD, NYBERG, BENDES, KUHNER & LITTLE, P.C.**  
1970 Broadway, Suite 600  
Oakland, California 94612  
Telephone: (510) 763-1000  
Facsimile: (510) 273-8669  
Email: c.kuhner@kornfieldlaw.com

Proposed Attorneys for Debtor-In-Possession

UNITED STATES BANKRUPTCY COURT  
FOR THE NORTHERN DISTRICT OF CALIFORNIA

In re  
Precision Swiss Products, Inc.,

Debtor.

Case No. 24-51678 MEH

Chapter 11

**STIPULATION RESOLVING ALL  
DISPUTES BETWEEN DEBTOR  
AND WEBFUNDER, LLC**

Debtor Precision Swiss Products, Inc., by and through its undersigned counsel, and Webfunder, LLC, by and through its undersigned counsel, state their Stipulation Resolving All Disputes between Debtor and Webfunder, LLC as follows:

**BACKGROUND**

1. On June 30, 2023, the Debtor and Webfunder, LLC entered into a Future Receivables Sale and Purchase Agreement (“Agreement”) under which the Debtor sold, assigned and transferred to Webfunder, LLC \$ 399,000 (“Purchased Amount”) of Receipts, as that term is defined in the Agreement.

2. On November 4, 2024 (“Petition Date”), the Debtor filed its voluntary petition for relief under Chapter 11 of the United States Bankruptcy Code in this Court.

12. Subject to payment of the \$25,000 being held by Lam Research to Webfunder and incorporating this Stipulation into the Debtor's Plan of Reorganization, this Stipulation resolves any

1 and all issues between Debtor and Webfunder, including, without limitation, any asserted objections  
2 to any claims, objections to confirmation of any proposed Plan of Reorganization, any and all claims  
3 that could be brought via adversary proceeding, and objections to the use of cash collateral.

4 13. While this Stipulation intends to resolve any and all issues, Webfunder reserves the  
5 right to object to the Plan of Reorganization to the extent the Plan of Reorganization does not  
6 incorporate the terms of this Stipulation, or the Debtor otherwise defaults on the terms of this  
7 Stipulation.

8 WHEREFORE, the Debtor and Webfunder respectfully request that the Court enter an Order  
9 approving this resolution of all disputes between them and grant such other and further relief as this  
10 Court deems just and proper.

11  
12  
13 Dated: November 13, 2024

Kornfield, Nyberg, Bendes, Kuhner & Little, P.C.

14  
15 By: /s/ Chris D. Kuhner  
16 (Bar No. 173291)  
17 Proposed Attorneys for Debtor-In-Possession

18 Dated: November 13, 2024

**KAMINSKI LAW, PLLC**

19  
20 By: /s/ Shanna M. Kaminski  
21 Shanna M. Kaminski  
22 Counsel for Webfunder, LLC  
23  
24  
25  
26  
27  
28